

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

BRIAN D. PIERCE,

Plaintiff,

-vs-

PENNSYLVANIA DEPARTMENT
OF CORRECTIONS,

Defendant.

Civil Action
No. 03-173E

DEPOSITION OF: CHRISTINE MASSUNG

DATE: January 20, 2005
Thursday, 3:50 p.m.

LOCATION: Law Offices of Neal Sanders
1924 North Main Street Ext.
Butler, PA 16001
724-282-7771

TAKEN BY: Plaintiff

REPORTED BY: Toni Rennebeck, RPR
Notary Public
NMR Reference No. 30738B

ORIGINAL

PLAINTIFF'S
EXHIBIT

Gibson

2

RTERS

4-444-4433

1 Area code 814 if you want to call them.

2 Q. All right. What period of time did you work for
3 Beverly Health Care? What month of what year to
4 what month of what year?

5 A. I worked about two-and-a-half years. I finished
6 at the end of August of 2004. It was two years
7 prior to that. I was there about two-and-a-half
8 years.

9 Q. So you finished working at Beverly Health Care
10 in August of '04?

11 A. Yes. So it was probably 2002.

12 Q. What month of 2002 do you think you started
13 working for Beverly Health Care?

14 A. I think April.

15 Q. Who did you work for before Beverly Health Care?

16 A. The prison.

17 Q. What prison?

18 A. SCI Cambridge Springs.

19 Q. I have to ask all this even though I know what
20 you're telling me.

21 A. Okay.

22 Q. And what month of what year did you resign from
23 SCI Cambridge Springs?

24 A. January of 2002.

25 Q. What was your position when you resigned SCI

1 Cambridge Springs?

2 A. I was the health care administrator.

3 Q. Now, what year did you start working for the SCI
4 system?

5 A. I started working in March of 1992.

6 Q. Did you ever work at an SCI other than Cambridge
7 Springs?

8 A. No.

9 Q. Have you ever been to an SCI other than
10 Cambridge Springs?

11 A. Yes.

12 Q. Have you ever been to SCI Albion?

13 A. Yes.

14 Q. More than once?

15 A. Many times.

16 Q. Why do you say many times?

17 A. Because they had meetings and things and I had
18 to go to the meetings.

19 Q. And whenever you went to those meetings, did you
20 ever come to know people like Judy Weyers?

21 A. Yes.

22 Q. What about Henry Powell from personnel?

23 A. Oh, yes, I've seen him, yeah. I didn't really
24 know him that well.

25 Q. But you've talked to him?

1

2 BY MR. SANDERS:

3 Q. I'm showing you what we've put in front of you
4 as your Exhibit 3 in this case.

5

6 (The witness reviewed the document.)

7

8 BY MR. SANDERS:

9 Q. Do you have Exhibit 3 in front of you?

10 A. Yes, I do.

11 Q. This would be a letter from Bill Wolfe to Brian
12 Pierce copied to you on or about January 16th of
13 '01; correct?

14 A. Yes.

15 Q. Announcing the transfer of Brian from SCI Albion
16 to SCI Cambridge Springs?

17 A. Yes.

18 Q. And going on to announce that Brian's immediate
19 supervisor would be you?

20 A. Yes.

21 Q. On the bottom of this document it's copied to
22 you and it's also copied to Henry Powell at SCI
23 Albion; is that correct?

24 A. Yes.

25 Q. Now, let me take you back to '00. 2000. As a

1 Q. Did you ever see Ms. Pietrzak acting out at
2 work? Yelling? Screaming? Losing her temper?

3 A. Yes.

4 Q. Did you ever report that?

5 A. Yes.

6 Q. Who did you report it to?

7 A. I reported it to my supervisor.

8 Q. Who would have been Mr. Good?

9 A. Uh-huh.

10 Q. Is that yes?

11 A. Yes.

12 MR. SANDERS: That's all I have.

13 - - - -

14 EXAMINATION

15 - - - -

16 BY MR. EDDY:

17 Q. I just have a couple of questions.

18 Obviously at some point in time you
19 found out that Mr. Pierce had been terminated
20 from SCI Cambridge Springs?

21 A. Yes, I did.

22 Q. Do you remember how or under what circumstances
23 you found that out?

24 A. Nancy Giroux, I ran into her one time and she
25 told me.